



MS GOLD BULLION

Whistle Blowing Policy

SCOPE:

This policy is applicable to all employees of MS Gold Bullion Sdn Bhd, including part-time, temporary, and contract employees, allowing every employee the opportunity to express concerns in a confidential manner.

PURPOSE:

MS Gold Bullion is dedicated to upholding the highest standards of ethical, moral, and legal business conduct. In line with this commitment and our emphasis on open communication, the purpose of this policy is to:

- Provide a platform for employees to raise concerns regarding ethical or compliance issues or any improper behaviour.
- Assure employees that they will be safeguarded from retaliation or victimization for reporting concerns in good faith.

Employees are obligated to report ethical or compliance concerns or any other form of improper behaviour, including the types of concerns listed below. They may report such concerns to their immediate supervisor, the compliance officer, a manager, or through the independent hotline service. If employees choose to use the hotline service, they have the option to remain anonymous.

POLICY:

The whistleblowing policy aims to address serious concerns, including but not limited to:

- Ethical violations
- Money laundering
- Human rights abuses
- Unsafe working conditions
- Sexual harassment
- Discrimination
- Alcohol and substance abuse
- Fraud
- Theft and embezzlement
- Violation of the law
- Threats
- Violation of company policy
- Misuse of company property
- Bribery and corruption

While the aforementioned list is not exhaustive, the policy intends to cover issues related to unethical or illegal behaviour or similar forms of improper conduct within MS Gold Bullion and our precious metal supply chains. Regular business matters that do not require anonymity should be addressed directly with the employee's supervisor and are not within the scope of this policy.

Date:16 June 2023



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SAFEGUARDS:

Harassment or Retaliation

Any form of harassment or retaliation against individuals who submit reports will not be tolerated and may result in disciplinary action, including possible termination of employment.

Confidentiality

Reports made in accordance with this policy will be handled confidentially. Every effort will be made to safeguard the anonymity of the reporter to the extent permitted by local law. However, please be aware that the information provided under this policy, whether through a hotline report or by other means, may form the basis of an internal and/or external investigation conducted by the company regarding the reported issue. During the course of the investigation, it is possible that the company may become aware of the reporter's identity based on the information provided in the report.

Anonymous Allegations

This policy allows employees to choose to remain anonymous. Concerns expressed anonymously will be investigated; however, certain factors will be taken into consideration, including:

- The seriousness of the raised issue
- The credibility of the concern
- The likelihood of confirming the allegation through attributable sources

Malicious Allegations

Malicious allegations may lead to disciplinary action, up to and including termination of employment. If the reporting employee is involved in the improper activity being reported, the company may decide or be required to take disciplinary action against that employee. In such cases, the employee's decision to report will be considered when determining the appropriate disciplinary response.

Procedure:

Reporting via Hotline

A confidential hotline, provided by a third-party service, is available for employees and external stakeholders who prefer to make anonymous reports. Information on the procedures for utilizing the hotline is prominently displayed within the facilities, and a form is also accessible on the company website for employees and external stakeholders.

Timing

Employees who become aware of misconduct covered by this policy are encouraged to report it as soon as possible. The earlier a concern is expressed, the easier it is for the company to take appropriate action.



Evidence

While employees are not expected to prove the truth of an allegation, they are required to demonstrate that there are valid grounds for concern when submitting a report.

Reports should be based on facts rather than speculation, and employees should provide as much detailed information as possible to facilitate the investigation of their concerns.

Handling of Reports:

All complaints will be treated seriously and respectfully, and the actions taken will depend on the nature of the concern. The company reserves the sole discretion to determine whether reports will be investigated or not. The MS Gold Bullion Board of Directors receives a copy of each report and subsequent follow-up reports detailing the actions taken by the company. These reports serve as a valuable resource for identifying areas of improvement in the whistleblowing mechanism and for preventing future grievances and harm.

Initial Inquiries

Preliminary inquiries will be conducted to assess the need and appropriate form of an investigation. Some concerns may be resolved through agreed-upon actions without the necessity of an investigation.

Feedback to Reporter

Whether a report is submitted directly to MS Gold Bullion personnel or through the hotline, the individual reporting the concern will have the opportunity to receive updates regarding their report, including:

- Confirmation of receipt of the concern
- Explanation of how the matter will be addressed
- An estimated timeframe for a final response
- Notification if initial inquiries have been conducted
- Communication regarding the decision to proceed with further investigations or reasons for not doing so

Further Information

The extent of communication between the reporting individual and the investigating parties will depend on the nature of the issue, the clarity of the information provided, and the availability of the reporter for follow-up. Additional information may be requested from the reporter as needed.

Outcome of an Investigation

At the discretion of the company and subject to legal and other constraints, the reporter may be informed of the outcome of the investigation.

MS Gold Bullion reserves the right to modify or amend this policy at any time as deemed necessary.